

THE SIMON LAW GROUP, LLP
Robert T. Simon (SBN 238095)
Brandon J. Simon (SBN 291475)
34 Hermosa Avenue
Hermosa Beach, CA 90254
Tel: (855) 855-8910
Fax: (855) 855-8910

FIORE ACHERMANN
Jennifer Fiore (SBN 203618)
Sophia Achermann (SBN 262712)
340 Pine Street, Suite 503
San Francisco, CA 94104
Tel./Fax: 415-550-0650
Email: jennifer@theFAfirm.com
sophia@theFAfirm.com

Attorneys for Plaintiff, JANE DOE

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE:

BIJOU-CENTURY, LLC,
Debtor.

CHAPTER 11 BANKRUPTCY
Case No. 22-30126 HLB

**AMENDED NOTICE OF MOTION
FOR RELIEF FROM THE
AUTOMATIC STAY**

Chapter 11 Filed: March 13, 2022

Date: July 14, 2022

Time: 1:00 p.m.

Judge: Hon. Hannah L. Blumenstiel

Courtroom: 19

**TO: THE HONORABLE UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR,
THE OFFICE OF THE UNITED STATES TRUSTEE, THE SUBCHAPTER V
TRUSTEE AND OTHER PARTIES IN INTEREST:**

PLEASE TAKE NOTICE that on July 14, 2022 at 1:00 p.m., or as soon thereafter as this matter may be heard, in Courtroom 19 of this Court, which is located at 450 Golden Gate Avenue, San Francisco, California, JANE DOE, (“Movant”), creditor of Debtor Bijou-Century, LLC (“Debtor”), will and hereby moves this court, pursuant to 11 USC 362 (a) and Northern District Bankruptcy Court Local Rules 4001-1 and 9014-1, for an order modifying the automatic stay as to the following pending non-bankruptcy lawsuit (*Jane Doe v. Déjà vu – San Francisco, LLC, et al.*) in San Francisco County Superior Court (Case No. CGC-20-586943, filed September 21, 2020) against Debtor to the limits of Debtor’s available insurance policies. Pursuant to Bankruptcy Local Rule 4001-1 (a), this notice shall and does advise respondent to appear personally or by counsel at the preliminary hearing.

PLEASE TAKE FURTHER NOTICE that the motion is based upon this Notice of Motion, the Motion, the Declaration of Sophia Achermann submitted herewith, the record in this case, and such further oral and documentary evidence as may be presented at the hearing on this Motion.

PLEASE TAKE FURTHER NOTICE that the hearing will not be conducted in the Presiding Judge's courtroom but instead will be conducted by telephone or video, and all interested parties should consult the Bankruptcy Court's website at www.canb.uscourts.gov for information about Court operations during the COVID-19 pandemic. The Bankruptcy Court's website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.

Respectfully submitted,

DATED: June 17, 2022

THE SIMON LAW GROUP, LLP and
FIORE ACHERMANN

By:

Sophia Achermann, Esq.
Attorneys for Plaintiff/Creditor